



Secretary/Treasurer:  
THOMAS ASSOCIATES, INC.

April 20, 2016

Mr. Joel Recht  
Associate Executive Director for Engineering Sciences  
U.S. Consumer Product Safety Commission  
5 Research Place  
Rockville, MD 20850

SUBJECT: PGMA Follow-Up from Tech Summit

Dear Joel,

We appreciate CPSC's time during the PGMA Tech Summit on March 17 in Baltimore. The presentations and brainstorming sessions were informative and PGMA's Tech Committee and Board have been meeting to discuss next steps.

As a reminder, since its inception in 2009, PGMA has done the following to promote the safe use of portable generators:

1. Developed an ANSI approved design and safety standard for the portable generator industry (PGMA/ANSI G300);
2. Developed Safety First promotional materials on [pgmaonline.com](http://pgmaonline.com);
3. Undertook a significant public relations/safety awareness program with monthly releases generating nearly 21,000 media placements and 653 million total media impressions.
4. Developed the "Take It Outside" campaign with social media, safety video and fact sheet to create even more awareness of the safe use of portable generators;
5. Worked with NARUC to develop *CA-1 Resolution Recognizing the Importance of Educating Consumers on Portable Generator Carbon Monoxide Safety*;
6. Sent a letter to utility commissions across the country urging them to send out safety information (Take it Outside Fact Sheet) with all shut off notices;
7. Continued participation in the UL CO Task Group;
8. Initiated a FOIA request and completed research on In-Depth Investigations in an effort to better understand the conditions under which portable generator-related incidents occur.
9. Engaged Exponent to conduct a human factors study to evaluate and modernize the mandatory CPSC warning label on portable generators.

We continue to work to help prevent incidents and some of our next steps are as follows:

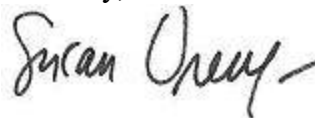
- The PGMA Technical Committee will create a performance based standard that addresses the CO hazard created when portable generators are misused by operating them in or near occupied spaces as its top priority. The performance standard, once developed, will be proposed to the canvass group for addition to ANSI/PGMA G300 in the next revision cycle.
- In May 2016 we will be meeting with Exponent for the first phase of the human factors study on the mandatory CPSC warning label;
- PGMA is supporting HR Bill 4701 and the Nicholas and Zachary Burt Memorial Carbon Monoxide Poisoning Prevention Act (S.1250) as we believe CO detection in homes can greatly decrease incidents;
- Provide feedback to CPSC on checklist items for data gathering at incidents to help in future research (see attachment);
- Continue to reach out to utilities to encourage them to share information about portable generator safety when shutting off power to a residence;
- Storm response plan - media outreach to targeted media outlets when a major storm is predicted.

We continue to seek support from the CPSC in the following areas:

1. Continue to spread the Take it Outside message through CPSC social media platforms;
2. With an identified population of potential incidents related to utility shut offs (one in five fatalities from CO emissions was due to the forced shut off of power by utility companies\*), we urge the CPSC to reach out to utility companies, NARUC and regulators to send safety awareness materials with all shut off notices.
3. After the human factors study is complete, work with PGMA to update the mandatory CPSC warning label to drive greater awareness of potential hazards and help prevent additional incidents;
4. Ensure all states have requirements for CO detectors in residences.

We believe by continuing to work together we can decrease the potential hazards associated with improper use of portable generators. We thank you for your support and look forward to hearing from you.

Sincerely,



SUSAN ORENGA  
Executive Director  
PGMA

\*Incidents, Deaths, and In-Depth Investigations Associated with Non-Fire Carbon Monoxide from Engine-Driven Generators and Other Engine-Driven Tools, 2004-2014", written by Matthew V. Hnatov of CPSC.

CC: Chairman Kaye  
Commissioner Adler  
Commissioner Buerkle  
Commissioner Mohorovic  
Commissioner Robinson

attachment

## **Checklist of items for CPSC investigations of misuse incidents of portable generators**

### **Generator/Situational Information**

- Manufacturer and model of generator
- Serial number of the generator
- Did the generator have the CPSC mandatory warning label?
- Where was the generator located? If outdoors how many feet from the home? If the generator was being used indoors, what was the size of the room where it was located (LxWxH)??
- For generators operating outdoors what direction was the exhaust facing (i.e. towards or away from a dwelling or structure)?
- How long was the generator in use?
- Was the generator owned, rented, borrowed?
- Was the person a permanent, temporary, or unauthorized resident of the structure or other location in which the incident occurred?
- For temporary and non-residential cases, how long had the person been staying there?
- Why was electricity not available (no service available vs. disconnected vs. interrupted (storm) vs. interrupted (construction/power company problem)?
- For no service or disconnects for non-payment, how long ago was service cut off?
- For cases involving construction/renovation, were those working residents or paid workers? Were those working inhabiting the structure when they were not working?
- Where there any survivors and if yes, why did they operate the generator in the selected location?
- If there were survivors did they understand the dangers of carbon monoxide?

### **Demographic Information:**

- Ethnicity
- Location (Urban/Rural)